

Krishnan Padmanabhan SBN: (254220)

KPadmanabhan@winston.com

# WINSTON & STRAWN LLP

200 Park Avenue

New York, NY 10166-4193

Telephone: (212) 294-6700

Facsimile: (212) 294-4700

## Attorneys for Comcast Defendants

*(Additional counsel information omitted)*

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
SANTA ANA DIVISION**

# ENTROPIC COMMUNICATIONS, LLC,

**No. 2:23-cv-1043-JWH-KES (Lead Case)**  
**No. 2:23-cv-1048-JWH-KES (Related Case)**

**Plaintiff,**

**No. 2:23-cv-1049-JWH-KES (Lead Case)**  
**No. 2:23-cv-1050-JWH-KES (Related Case)**

COMCAST CORPORATION;  
COMCAST CABLE  
COMMUNICATIONS, LLC; AND  
COMCAST CABLE  
COMMUNICATIONS  
MANAGEMENT, LLC.

Assigned to Hon. John W. Holcomb

**COMCAST DEFENDANTS' NOTICE  
OF NON-OPOSITION TO  
PLAINTIFF'S MOTIONS TO  
SUPPLEMENT AND AMEND**

### Defendants.

1       Comcast respectfully submits this notice of non-opposition to Entropic's (i) Motion  
2 to Supplement [the] Second Amended Complaint (C.A. 23-cv-1043, Dkt. 193), (ii) Motion  
3 to Supplement [the] Second Amended Complaint (C.A. 23-cv-1049, Dkt. 131), and (iii)  
4 Amendment to Motion for Leave to Amend and Supplement [the] Complaint (C.A. 23-cv-  
5 1049, Dkt. 143) (collectively "Entropic Amendments"). The result of Comcast's non-  
6 opposition to Entropic's Amendments is that Entropic will have a Second Amended  
7 Complaint operative in the 23-cv-1043 Matter (Dkt. 207-1) ("1043 Second Amended  
8 Complaint") and a Third Amended Complaint operative in the 23-cv-1049 Matter (Dkt.  
9 145-1) ("1049 Third Amended Complaint"). While Comcast maintains its view that  
10 Entropic's amended and supplemental allegations are futile, Comcast believes that the most  
11 efficient way to address Entropic's deficient allegations is by addressing all of them in  
12 renewed motions to dismiss, directed at the 1043 Second Amended Complaint and 1049  
13 Third Amended Complaint, consistent with this Court's February 15, 2024 Order. *See*  
14 23-cv-1043, Dkt. 347 at 3; 23-cv-1049, Dkt. 244 at 3. Comcast files this non-opposition  
15 without prejudice to any of the arguments in Comcast's previously filed motions to dismiss,  
16 which were directed to Entropic's December 8, 2023 complaints, which contained all the  
17 same allegations as the 1043 Second Amended Complaint and 1049 Third Amended  
18 Complaint that will now become operative.

1 WINSTON & STRAWN LLP  
2

3 Dated: February 21, 2024  
4

5 By: /s/ Krishnan Padmanabhan  
6 Krishnan Padmanabhan (SBN: 254220)  
7 kp padmanabhan@winston.com  
**WINSTON & STRAWN LLP**  
8 200 Park Ave., Florr 40  
9 New York City, NY 10166  
10 Tel: (212) 294-6700  
11 Fax: (212) 294-4700  
12

Diana Hughes Leiden (SBN: 267606)  
dhleiden@winston.com  
**WINSTON & STRAWN LLP**  
333 S. Grand Ave.  
Los Angeles, CA 90071  
Tel: (213) 615-1700  
Fax: (213) 615-1750  
13

Brian Ferguson (*pro hac vice*)  
bferguson@winston.com  
**WINSTON & STRAWN LLP**  
1901 L Street NW  
Washington, DC 20036  
Tel: (202) 282-5000  
Fax: (202) 282-5100  
14

Saranya Raghavan (*pro hac vice*)  
sraghavan@winston.com  
**WINSTON & STRAWN LLP**  
35 West Wacker, Dr.  
Chicago, IL 60601  
Tel: (312) 558-5600  
Fax: (312) 558-5700  
15

16 *Attorneys for Comcast Defendants*  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28